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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Jeffrey Krum,

Plaintiff,

v.

Citibank, N.A.; Credit One Financial and The
Bank of Missouri,

Defendants.

Case No.: 2:24-cv-00541

**Unopposed Motion for Extension of
Time for The Bank of Missouri, N.A. to
Answer or Otherwise Plead**

(First Request)

Plaintiff Jeffrey Krum, hereby files this unopposed Motion for Extension of Time for The Bank of Missouri N.A. to answer and in support states:

The Bank of Missouri, N.A.'s ("The Bank of Missouri") responsive pleading is due on April 29, 2024.

Plaintiff and The Bank of Missouri are actively engaged in case resolution negotiation.

Plaintiff does not oppose an extension of The Bank of Missouri's time to answer the Complaint so that the parties may devote energies to resolving this matter.

Plaintiff files this motion consistent with its agreement with The Bank of Missouri and further files this motion respectfully requesting the Court for an extension of time for The Bank of Missouri to file its responsive pleading on **Monday, May 20, 2024**.

1 Good cause exists for this extension because it will allow The Bank of Missouri and its
2 counsel to complete their investigation of the Plaintiff's claim and possible defenses and prepare
3 responsive pleading. It is expected that counsel for Plaintiff and The Bank of Missouri will continue
4 to discuss whether this matter may be resolved without further intervention from the Court in the
5 interim.

6 This is the first request for an extension.

7 For the forgoing reasons, Plaintiff requests that the Court issue an order extending the date to
8 **May 20, 2023** on which The Bank of Missouri must answer Plaintiff's complaint or otherwise plead.
9

10 DATED April 29, 2024.

11 Respectfully submitted,
12

13 **FREEDOM LAW FIRM**

14 /s/ Gerardo Avalos
15 George Haines, Esq.
16 Gerardo Avalos, Esq.
17 8985 S. Eastern Ave., Suite 100
18 Las Vegas, NV 89123
19 *Counsel for Plaintiff*
20

21 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

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23 
24 UNITED STATES MAGISTRATE JUDGE

25 Date: April 29, 2024
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